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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

AMERICAN CIVIL LIBERTIES UNION

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT; UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Case No. 4:23-cv-3450

**DECLARATION OF MARISOL
DOMINGUEZ-RUIZ IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

Date: May 9, 2024
Time: 1:00 p.m.
Location: Videoconference
Judge: Hon. Donna M. Ryu

DECLARATION OF MARISOL DOMINGUEZ-RUIZ

I, Marisol Dominguez-Ruiz, hereby declare:

1. I make this declaration based on my personal knowledge and if called to testify I could and would do so competently as follows:
2. I submit this declaration in support of Plaintiff's Motion for Summary Judgment. Plaintiff is the American Civil Liberties Union Foundation ("ACLU").
3. I am a Justice Catalyst Fellow at the ACLU National Prison Project and am admitted to practice law in the State of California and before this court. I am counsel for Plaintiff in the above-referenced action.
4. On November 9, 2023, Defendants provided a copy of the contract between Defendant ICE and third-party vendor, Relx, Inc., to Plaintiff.
5. Attached hereto as Exhibit A is the true and correct copy of the contract between Defendant ICE and third-party contractor, Relx, Inc., received by Plaintiff on November 9, 2023.
6. On January 8, 2024, I emailed Defendants' counsel, David DeVito, requesting additional documents or contract addenda between ICE and Relx. On January 10, 2024, Mr. DeVito replied and informed Plaintiff he was "not presently aware of any such additional documents."
7. Attached hereto as Exhibit B is the true and correct copy of via email between myself and Mr. DeVito related to additional documents of the contract. Mr. DeVito's mobile phone number has been redacted for privacy purposes.
8. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 29th of January, 2024 in Los Angeles, California.

/s/ Marisol Dominguez-Ruiz
Marisol Dominguez-Ruiz